

Response to USEPA Comments Received September 24, 2012 to the Draft QAPP Background Tissue Addendum dated September 14, 2012

No.	Section	Comment	Response
General comment			
1	General Comment	None of the sampling locations should be near a CSO or other point source. CDM, and Chuck Nace as possible, will provide oversight in the field to assure that this doesn't happen.	The QAPP Addendum and schedule have been globally updated to allow for a one- to three-day reconnaissance survey for selecting tissue sampling locations prior to the initiation of sampling. Language was also added to state that USEPA oversight will be present during the site reconnaissance survey to identify target sampling locations and target sampling locations will not be identified in areas near a CSO or other potential point sources.
2	General Comment	All species caught should be retained, and then a decision can be made on which ones to analyze. The current proposal limits the collection to four different fish species. Consistent with this comment, the use of seines should be added to the QAPP so that forage fish can be collected	The QAPP Addendum (Worksheet 11) has been revised to state that all non-target species will be retained for potential analysis and that beach seining will be attempted to target small forage fish where shallow areas are present and it is safe to do so. Note that analyzing fish species for tissue chemistry will be prioritized over sacrificing these species for the health evaluation. Accordingly, the following language has been added to the QAPP Addendum: "Health assessments will only be performed on fish species after the minimum mass for the analysis of 10 analytical samples has been collected. The minimum pre-homogenization mass is 150 g per analytical sample. For fish species to be analyzed as whole body samples (i.e., small forage fish), health assessments will not be performed until a total of 1,500 g of a given species is collected. For fish species to be analyzed as fillet and carcass samples (i.e., all non-small forage fish), health assessments will not be performed until a total of 4,500 g of a given species is collected (assuming that 450 g of whole fish would provide approximately 150 g for a fillet sample)."
3	General Comment	Errors were made during the previous toxicity testing efforts that should not be repeated. EPA's comments on the January 31, 2012 Toxicity Testing Report are also being submitted at this time, and should be reviewed prior to conduct of this effort.	This comment does not relate to the Tissue QAPP Addendum. Please see the response to comments to the Sediment QAPP Addendum.
Specific comments			
1	Page 1	Remove the word "urban" from the title of Appendix B to the RARC, as per EPA comments on that document.	The word "urban" has been deleted from the title of Appendix B to the RARC.

2	Worksheet 10, Page 12, the problem to be addressed by the project	Please delete the first 2 sentences of the 2 nd paragraph of this section, and instead state, at the end of the paragraph, that the approach that will be used to establish an estuarine background data set is still being developed.	The first 2 sentences in the 3 rd paragraph (where estuarine background data are discussed) were deleted and the following sentence was added: "The approach that will be used to establish a regional estuarine background data set is still being developed."
3	Worksheet 10, Page 14, Information concerning various environmental indicators	EPA has not yet submitted comments on Appendix B of the RARC, and determinations such as that made in this section have not yet been made. Instead, please state that the need for additional tissue collection efforts to obtain background and/or reference data may still be required.	Text has been revised; text was deleted stating that existing estuarine data will be used to establish an estuarine background dataset and the following text was added: "The need for additional tissue collection efforts to obtain background and/or reference data from estuarine environments in the LPR region may be required, but such a collection effort is not described in this QAPP Addendum."
4	Worksheet 10, Page 13, The possible classes of contaminants and the affected matrices	Please provide the rationale (here and/or in the appropriate section) for why VOCs and herbicides are not included in this collection effort, as was done in the original QAPP related to tissue collection.	Rationale (the same language presented in the Fish/Decapod QAPP) has been added to this section of Worksheet 10 on why VOCs and herbicides are not proposed for analysis.
5	Worksheet 10, Page 15, Project Decision Condition	There are many decisions that will be required for the project objectives to be accomplished in addition to potential weather delays. These should be summarized here or reference made to the appropriate document/ plan where this information is found.	Additional project decision conditions have been added.
6	Worksheet 11	Please see General Comment 2.	The QAPP Addendum (Worksheet 11) has been revised to state that all non-target species will be retained for potential analysis and that beach seining will be attempted to target small forage fish where shallow areas are present and it is safe to do so.
7	Worksheet 11, Page 17, How "good" do the data need to be in order to support the environmental decision?	Please remove the bulleted list from this section, and instead state that the factors to establish an appropriate dataset for background freshwater tissue are still being developed.	The bulleted list has been deleted and the following sentence was added: "The evaluation factors that will be used to establish an appropriate dataset for background freshwater tissue are still being developed."
8	Worksheet 14, Page 24, Documentation and Records	Change "an" to "a" in the second sentence.	Language was changed accordingly.
9	Worksheet 16, Page 26	Please update the dates provided in the schedule. Include when the field reconnaissance will occur. EPA will want to provide oversight of the site reconnaissance as well as fish tissue collection sampling events.	Dates have been updated.

